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Attorney for Santander Consumer USA Inc. dba Chrysler Capital
JM5630_____

United States Bankruptcy Court
For the District of New Jersey

IN RE:
ASSUNCAO BROS., INC.

HEARING DATE:
CHAPTER 11
CASE NUMBER: 22-16159 (CMG)

The application of John R. Morton, Jr., Esquire, respectfully represents:

1. I am the attorney for Santander Consumer USA Inc. dba Chrysler Capital and am fully familiar with the facts of this case.
2. Debtor's attorney has consented to entry of an order vacating the automatic stay allowing our client to repossess and sell the vehicle.
3. Good cause exists for entry of the order for stay relief.

WHEREFORE, applicant requests entry of the order submitted herewith.

/s/ John R. Morton, Jr., Esq.
John R. Morton, Jr., Esq.
Attorney for Santander Consumer USA Inc. dba
Chrysler Capital